

REMARKS

This amendment is in response to the Office Action dated May 31, 2006. Reconsideration of the above-identified application in view of the amendments above and the following remarks is respectfully requested.

Claims 1, 3-13 and 15-18 are currently pending in the application. Claims 3, 5-6, and 8 are withdrawn from consideration. Claim 18 was allowed. No new matter is added by the present amendments.

Claims Rejections under 35 USC 102(e)

The Examiner rejected claims 1, 7, 12-13, and 15-16 under 35 USC 102(e) as being anticipated by US Patent No. 6,272,339 to Wideman et al. (hereinafter: "*Wideman*"). The Applicant believes that *Wideman* does not anticipate all the limitations of the amended independent claims 1 and 12. The Applicant further believes that the dependent claims are not anticipated, as they are dependent on the allowable independent claim.

The Examiner is of the opinion that *Wideman* discloses a cellular telephone network that comprises peripheral branches and a central high-capacity data trunking region and using a synchronous data communication protocol. The Examiner further believes that in *Wideman* the high-capacity data trunking region comprises a satellite interface for a satellite connection using a non-synchronous data communication protocol.

Though Applicant recognizes that both the present invention and *Wideman's* invention relates to satellite infrastructures for communication networks, as noted by the Examiner, Applicant believes that the present claims as amended are distinguished over *Wideman's* teachings in essential features.

One of the distinguishing features relied upon is that the present invention is dedicated for the E1 and T1 protocols. The Examiner explicitly expressed his position in his rejection to Claim 3, 5 and 11 that *Wideman* fails to disclose the combination of E1 and TCP/IP data communication protocols.

Another distinguishing feature relied upon is that an SS7 control signaling is distributed in both the E1 and the TCP/IP protocols. Such a control signaling is not mentioned, taught or even suggested by *Wideman*.

Another distinguishing feature that is relied upon is that the present invention comprises an E1 – TCP/IP converter that utilizes a multiplexer. As the E1 and TCP/IP communication protocols are not even mentioned in *Wideman's* disclosure, it is clear that an E1 – TCP/IP converter or a multiplexer, which are used for converting between the E1 signals and the TCP/IP signals, are not taught or even suggested by *Wideman*.

It is known that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference, See *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). As none of the aforementioned distinguishing features of amended claims 1 and 12 is found, either expressly or inherently described in *Wideman's* disclosure, it is clear that amended claims 1 and 12 are not anticipated by it.

Based on the aforementioned differences between the present invention and *Wideman*, as elaborated hereinabove, claims 1 and 12 are amended as above and are now believed to be novel, and inventive.

Several aspects of the present invention are presented hereinafter in order to further emphasize the inventiveness of the amended claims 1 and 12 in the light of the aforementioned distinguishing features.

As described above, one of the distinguishing features of the present invention over *Wideman* is that the present invention is dedicated for E1 and T1 protocols. The Examiner's position, as expressed in his rejection to Claim 3, 5, and 11, is that US Patent No. 6,735,184 to Davidson et al. (hereinafter: "*Davidson*") discloses handling both E1 synchronous and asynchronous data communication protocols. The Examiner is further of the position that it would have been obvious to the skilled man in the art, at the time the invention was made, to modify the system of *Wideman*, with the teaching of *Davidson*, to disclose mobile services switching center redundancy and load sharing in E1 synchronous and asynchronous data communication protocol. Applicant recognizes that both the present invention and *Davidson's* invention disclose methods and system which are capable of handling E1 synchronous and asynchronous data communication.

However, as disclosed in the amended claims 1 and 12, in the present invention the E1 communication is based on SS7 control signaling. Almost all the references brought by the Examiner do not mention, teach or even suggest the usage

of such a protocol. The only reference brought by the Examiner that actually mentions such a protocol is US Patent Application Pub. No. 2003/0012159 to Vassilovski et al. (hereinafter: "*Vassilovski*"). *Vassilovski* discloses a system and method for mobile station authentication. The Examiner is of the opinion that it would have been obvious to one of ordinary skill in the art, at the time of the invention was made, to modify the modified *Wideman* with the teaching of *Vassilovski*, in order to provide SS7 call control message features.

In order to establish a *prima facie* case of obviousness a suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, have to be found in order to modify the reference or to combine reference teachings, See *Ex parte Skinner*, 2 USPQ2d 1788 (Bd. Pat. App. & Inter. 1986. Applicant believes that there is no suggestion or motivation, in the *Wideman*, *Davidson*, or *Vassilovski* disclosures, or in the knowledge generally available to one of ordinary skill in the art, to further modify the already once modified *Wideman* to disclose, teach or suggest the teaching of *Vassilovski*.

In particular, applicant believes there is no motivation to further modify the already modified paging system of *Wideman* according to the method and system for mobile station authentication of *Vassilovski* to construct a communication system with an E1 - TCP/IP converter that supports SS7 control signaling for non-VOIP. The section cited by the Examiner in relation to *Vassilovski* is related to an IS41 gateway, which is used for effecting communication between a mobile station, and a **wireless telephone** that is not configured to support voice over IP (VoIP), See *Vassilovski* paragraph [0016]. On the contrary, the E1 - TCP/IP converter of amended claims 1 and 12 is related to the interface between **satellite systems** and **terrestrial systems**. Applicant believes there is no motivation or suggestion to modify *Wideman* to comprise such an IS41 gateway that is related to VoIP communication.

Moreover, it should be noted that the E1 - TCP/IP converters of amended claims 1 and 12 convert between E1 signals and the TCP/IP signals. On the contrary, *Vassilovski's* IS41 gateway is only configured to extract code division multiple access (CDMA) parameters from IP packets and reformats IP as necessary to IS41 protocol that uses SS7, See *Vassilovski* paragraph [0020]. Modifying *Wideman's* system or the modified *Wideman's* system according to *Vassilovski* will not produce the E1

TCP/IP converter of amended claims 1 and 12 as the teaching of *Vassilovski* does not disclose such a converter.

Another inventively distinguishing feature of amended claims 1 and 12 is the multiplexer *that is used for converting between the E1 signal and the TCP/IP signal*. The Examiner's position, as expressed in his rejection to Claim 6 and 8, is that *Davidson* discloses such a multiplexer. Applicant has carefully reviewed, several times, the section cited by the Examiner in relation to the multiplexer (See *Davidson* Column 5, lines 39-65). Based thereupon, Applicant respectfully urges that this section does not mention, teach or even suggest a multiplexer as defined in the claim which is for converting between an E1 signal and a TCP/IP signal. *Davidson's* multiplexer is specifically configured for *multiplexing coded speech through the transmission layer of satellite-terrestrial network*; see *Davidson* Column 5, lines 60-65. *Davidson's* multiplexer is configured to be integrated into a packet assembler/disassembler (PAD). The PAD is configured to allow a satellite access node (SAN) to communicate with another SAN through a GSM infrastructure according to IP transportation protocols. The PAD is clearly not configured to handle E1/T1 transmissions. Thus, it is clear that *Davidson's* multiplexer and the multiplexer of amended claims 1 and 12 are configured differently as having different aims.

The applicant believes that none of the references brought by the Examiner, nor the combination thereof, discloses a cellular telephone network that renders obvious the currently amended claim 1. The remaining dependent claims are believed to be allowable as being dependent on allowable main claims.

Rejections under 35 USC 103(a)

Claims 3-6, 8, and 10-11 were rejected under USC. 103(a) as being obvious over *Wideman* in view of *Davidson*. Claims 3, 6 and 8 were from consideration.

Claim 9 was rejected under USC. 103(a) as being obvious over *Wideman* in view of *Davidson* and further in view of *Vassilovski*.

It is believed that Claims 3-5, and 9-11 are now allowable as being dependent from allowable independent claim 1.

All of the issues raised by the Examiner have been dealt with. In view of the foregoing, it is submitted that all the claims 1, 3-13 and 15-18 are now pending in the application are allowable over the cited reference. An early Notice of Allowance is therefore respectfully requested.

Respectfully submitted,



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